

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

HARTFORD INVESTMENT FINANCIAL  
SERVICES, LLC,

Defendant.

Civil No. 1:11-cv-01083-RMB-KMW

JENNIFER KASILAG, *et al.*,

Plaintiffs,

v.

Civil No. 1:14-cv-01611-RMB-KMW

HARTFORD FUNDS MANAGEMENT  
COMPANY, LLC,

Defendant.

**JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING  
EXPERT DISCOVERY SCHEDULE AND RELATED DEADLINES**

WHEREAS, pursuant to the Court's December 3, 2014 Scheduling Order (Dkt. No. 129 in Civil No. 1:11-cv-01083), Plaintiffs are scheduled to serve their expert reports and disclosures pursuant to Fed. R. Civ. P. 26(a)(2) no later than February 13, 2015;

WHEREAS, Plaintiffs' experts expect to offer opinions concerning or based upon the deposition testimony of a corporate representative of non-party JPMorgan Chase Bank, N.A. ("JPMorgan");

WHEREAS, Plaintiffs initially noticed the deposition of JPMorgan for November 14, 2014;

WHEREAS, between December 2014 and January 2015, JPMorgan has cancelled or postponed the deposition on three occasions, the most recent occurring on January 28, 2015, due to weather conditions that prevented JPMorgan's designee from traveling from Boston to New York City for the deposition;

WHEREAS, the deposition of JPMorgan now will take place on February 4, 2015;

WHEREAS, Plaintiffs have proposed a two-week extension of the deadline to serve their expert reports and disclosures to allow adequate time after the JPMorgan deposition for Plaintiffs and their experts to obtain a transcript of the deposition, assess JPMorgan's testimony, and incorporate any opinions concerning or based upon such testimony into their expert reports and disclosures; and

WHEREAS, Defendants have consented to the proposed two-week extension, contingent upon subsequent deadlines being extended accordingly;

NOW, THEREFORE, the parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

1. All expert reports and disclosures pursuant to Fed. R. Civ. P. 26(a)(2) on behalf of Plaintiffs shall be served upon counsel for Defendants no later than February 27, 2015.
2. All expert reports and disclosures pursuant to Fed. R. Civ. P. 26(a)(2) on behalf of Defendants shall be served upon counsel for Plaintiffs no later than April 16, 2015.
3. Plaintiffs' rebuttal expert reports and disclosures pursuant to Fed. R. Civ. P. 26(a)(2) shall be served upon counsel for Defendants no later than May 18, 2015.
4. Depositions of proposed expert witnesses shall be concluded by July 3, 2015.
5. Dispositive motions shall be filed with the Clerk of the Court no later than June 5, 2015.

Dated: January \_\_, 2015

By: /s/ Robert L. Lakind

Robert L. Lakind

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Respectfully submitted,

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*Attorneys for Defendants*

SO ORDERED,

January 21, 2015

Hon. Karen M. Williams

United States Magistrate Judge